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Attorney for Defendant

MIGUEL REYES-GARCIA

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON  
(Honorable Edward F. Shea)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MIGUEL REYES GARICA,

Defendant.

NO. 4:15-CR-6049-EFS-21

DEFENDANT'S OBJECTION  
TO UNITED STATES MOTION  
FOR EXTENSION OF TIME  
(ECF 654) AND (ECF 655)

COMES NOW, Ken Therrien the attorney for the defendant Miguel Reyes Garcia and objects to the Governments extension of time to file CI Disclosures and Grand Jury Transcripts. This motion is based upon the files and records herein and the Declaration of Counsel filed herewith.

DECLARATION

Ken Therrien upon oath deposes and states:

1. I am the attorney of record in this matter. I was appointed in this matter January 18, 2017 (ECF 300).

2. The Government was aware of the issues, which serve as the basis for its request, days before the February 23 2018 disclosure date.
3. On February 9, 2018 Catlin Baunsgard filed a Notice of Appearance in this case ECF 632. Yet the Government near the end of business day on the night before the disclosures were due to file its request for this extension.
4. Mr. Reyes Garcia objects to this extension. The trial date is set for March 26, 2018. No motions to continue the trial date have been made at the time of this filing.
5. The Government should have already prepared the disclosures which are the subject matter of the Governments.
6. Mr. Reyes-Garcia requests leave to supplement this motion due to the limited time that has been provided for him to properly respond to the Government's motion.
7. Mr. Reyes-Garcia respectfully request that the Court order the CI Disclosures and Grand Jury Transcripts as previously ordered by this Court.
8. DATED this 22<sup>nd</sup> day of February 2018.

s/ Ken Therrien

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on February 22, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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*s/ Ken Therrien*

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